

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

As representative of

THE COMMONWEALTH OF PUERTO
RICO, *et al.*,

Debtors¹

PROMESA
Title III

No. 17 BK 3283-LTS

Re: ECF No. 24045

**MOTION FOR LEAVE TO FILE SPANISH DOCUMENTS AND REQUESTING A
TERM TO FILE CERTIFIED TRANSLATION BY JULY 6, 2023**

To the Honorable United States District Judge Laura Taylor Swain:

COMES NOW, Badillo Saatchi & Saatchi Inc. (“BSS”), by and through the undersigned legal counsel, and respectfully requests as follows:

BSS filed its *Response to the Five Hundred Sixty-Ninth Omnibus Objection (Substantive) Of The Commonwealth Of Puerto Rico, The Puerto Rico Highways And Transportation Authority, And The Puerto Rico Public Buildings Authority To Claims That Are Partially Satisfied And/Or Partially Assert Amounts For Which The Debtors Are Not Liable* on June 22, 2023. See Dkt. No. 24637 (“Response”). The Response contains the unsworn declaration under penalty of perjury issued by Carmen Teresa León Vicéns on June 22, 2023 (the “Declaration”) (Dkt. No. 24637-1), which Declaration includes certain documentation in the Spanish language. See Dkt. No. 24637-2 – 24637-4, and 24637-8 – 24637-11.

¹ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801).

BSS hereby moves for leave to file Dkt. No. 24637-2 – 24637-4, and 24637-8 – 24637-11 in their original Spanish language, and for a term of two (2) weeks to file a certified English translation pursuant to Local District Court Rule 5(c).

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 22nd day of June 2023.

CERTIFICATE OF SERVICE: In accordance with Fed. R. Bankr. P. 9014(b), Fed. R. Bankr. P. 7004(b), and the *Sixteenth Amended Notice, Case Management and Administrative Procedures Order* (Docket No. 20190-2 of Case No. 17-03283 (LTS)) (the “CMP Order”), we hereby certify that a true and exact copy of the foregoing was sent by electronic mail upon all the parties listed in the Master Service List and by U.S. mail upon all the Standard Parties listed in the CMP Order.

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